

Dear Michael –

Detailed below is a list of items that the City has requested from the USEPA regarding the Allied Site.

- 1) Acreage of various portions associated with OU-1
 - a. Landfill Area – current and future (based on implementation of Alternative 2B)
 - b. Panelyte Site
 - c. Total acreage that will be available for development (based on implementation of Alternative 2B)
 - d. Green space associated with Portage Creek/potential trailway
- 2) Panelyte Site
 - a. Availability of “comfort letter” to facilitate potential City ownership of site
 - b. Access to site – current and future
- 3) Western Disposal Area of OU-1
 - a. Rationale behind assumptions that the Western Disposal Site does not pose significant future contamination risk
 - b. Documentation supporting this rationale including:
 - i. Soil borings
 - ii. Groundwater monitoring
 - iii. Well logs/data
 - iv. Historical information/data associated with disposal of materials at this location
- 4) Cork Street Landfill
 - a. Availability/Possibility of reducing groundwater monitoring frequency
 - b. Oversight by USEPA – long-term contacts, etc....
- 5) Operational Costs
 - a. Current Operation & Maintenance (O&M) costs associated with OU-1 (inclusive of groundwater management/monitoring)
 - b. Projected O&M costs (inclusive of groundwater monitoring) at OU-1 (based on implementation of Alternative 2B)
 - c. Comparative O&M costs at other existing “waste in place” landfills such as King Highway, and 12th Street in Otsego
 - d. Locations of other similar “waste in place” PCB landfills outside of the State of Michigan (and associated O&M costs)
 - e. Oversight of long-term maintenance
 - f. Long-term ownership of site
- 6) Bankruptcy Trustee Financial Information
 - a. Current balance in OU-1 Site Trust
 - b. Current and projected oversight costs associated with the Trust
 - c. Access to ongoing Trust financial statements

- d. If these are not available directly, information on this information can be accessed
- a. 7) Status of tour of USEPA Research & Development (R&D) sites for Mayor Hopewell

Detailed below is a list of our responses to questions raised by the City regarding the Allied Site.

- 2. Acreages for Areas of OU1 and Panelyte Acreage of various portions associated with OU-1
 - a. Landfill Area – current and future (based on implementation of Alternative 2B)
 - i. OU-1 = 89 acres
 - ii. Landfill = 45 acres (after implementation)
 - b. Panelyte Site = 22 total acres
 - i. Panelyte Property = 16 acres, includes marsh and Property not part of OU-1 based on future land use drawing
 - ii. Panelyte Marsh = 0.9 acres
 - c. MMLC Property = 3.5 acres based on future land use drawing
 - d. Monarch = 6.9 acres, may be ½ available depending on potential relocation of channel.
 - e. Total acreage that will be available for commercial/industrial development (based on implementation of Alternative 2B) = 29
 - i. Green space associated with Portage Creek/potential trail way
 - ii. Implementation of Alternative 2B will create green space in addition to opening up Panelyte and north area for development. With 2B the fences will be west of Portage Creek allowing access to Portage Creek.
- 3. Panelyte Property
 - a. Issue: Want to work on it, but cannot get comfort letter or access.
 - b. Response: EPA will incorporate it into OU1 and address contamination. City should them be able to acquire property after cleaned by EPA or under EPA oversight to industrial/commercial levels. No more comfort letter issue.
- 4. Western Disposal Area
 - a. Large amounts of paper residuals are in the WDA, so based upon our understanding of the paper residuals, EPA expects to find contamination (PCBs, inorganics and low levels of SVOCs) there similar to the HRDL and FRDL areas. EPA also expects the contamination to be bound up in the paper residuals and not readily migrate out of it via groundwater.
 - b. Documentation supporting this rationale including
 - a. Soil data
 - i. PCBs: Soil borings show PCBs up to 2500 but not mobile.
 - ii. Metals: nothing TCLP characteristic hazardous
 - b. Western Disposal Area documentation:
 - i. Section 4 of the RI discussed the nature and extent of contamination
 - ii. Figure 5 of the RI shows the soil data collection locations and Figure 8 shows the hydrogeologic sampling locations.

- iii. Tables 4-2A (CD) through 4-4D (CD) show the detections in the soil and groundwater with denotation of those samples collected in the Western Disposal Area.
 - c. Historical information/data indicates the possibility of drums having been disposed of in the WDA
 - i. Despite anecdotal information, the soil and groundwater investigations did not show indications of drums or other wastes having been disposed of. we do not have evidence of the stuff in the waste based on soil borings or groundwater in WDA.
 - ii. The March 2010 *Category N Baseline Environmental Assessment For Former Panelyte Property* and its appendices states that there are drums in the Panelyte Marsh. If drums or other wastes are encountered, it will dispose of it properly.
 - d. Future monitoring: if we find that the area is not protective, we will address it.
- 5. Cork Street Landfill
 - a. Issue: EPA unresponsive to requests for reduction in monitoring
 - b. Response: EPA made personnel adjustment to site and will be responsive
 - i. Same RPM as OU1 – step towards comprehensive understanding of gw in Kalamazoo.
- 6. Landfill Reuse?
 - a. Response: On the landfill itself, likely no reuse because of gas venting system. 2B would result in:
 - i. access to Portage Creek as the fences would be moved
 - ii. reuse at Panelyte and area north
 - iii. cleanup of Goodwill area
- 7. Bankruptcy Trustee Financial Information
 - a. Current balance in OU-1 Site Trust
 - b. Current and projected oversight costs associated with the Trust
 - c. Access to ongoing Trust financial statements
 - d. See Attached.
- 8. Current Operation & Maintenance (O&M) costs associated with OU-1 (inclusive of groundwater management/monitoring)
 - a. Projected O&M costs (inclusive of groundwater monitoring) at OU-1 (based on implementation of Alternative 2B)
 - i. From FS – \$3 M for monitoring and maintenance
 - b. Comparative O&M costs at other existing “waste in place” landfills such as King Highway, and 12th Street in Otsego
 - i. See attached
 - c. Locations of other similar “waste in place” PCB landfills outside of the State of Michigan (and associated O&M costs)
 - i. Nothing yet
 - d. Oversight of long-term maintenance
 - i. MDEQ and they have \$1.6 M for that
 - e. Long-term ownership of site
 - i. For now, it is the Trust

Status of tour of USEPA Research & Development (R&D) sites for Mayor Hopewell

- Charles Maurice: